



United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

February 20, 2025

BY ECF

The Honorable Jeannette A. Vargas
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *United States v. Ho, 25-3 (JAV)*

Dear Judge Vargas,

The Government writes respectfully to request, with the defendant's consent, that the Court issue a pretrial bond with the following conditions of release, which were previously imposed in the Central District of California where the defendant was first presented. The parties are still discussing modifications to the bail conditions and will likely write to the Court in the coming weeks to seek those modifications. However, the Government understands that a bond must issue today from the Southern District of New York in order for pretrial supervision of the defendant to transfer to this District.

- A personal recognizance bond of \$1,000,000, secured by \$500,000 cash deposit;
- Pretrial services supervision as directed;
- Surrender all passports and travel documents and make no new applications;
- Travel is restricted to Southern District of New York, Eastern District of New York, Central District of California, and all points of travel between for court appearances;
- Curfew, as directed by Pretrial Services, enforced by GPS monitoring
- No trading by the defendant or the defendant's company, One R Squared in any financial products, including securities, commodities, or cryptocurrency;

- No access to any cloud storage accounts or computer code repositories containing computer source code, including but not limited to Azure and AWS, used in connection with quantitative trading, except in the presence of counsel;
- No contact with any current or former employees of One R Squared, Headlands Technologies, or any employee of Tower Research in the presence of counsel

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

by: _____/s/
Ni Qian
Assistant United States Attorney
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